

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

been unable to complete the settlement. Plaintiff requested that the case be reinstated and the Court granted that request on February 16, 2016. *See Docket Entry 39*. Thereafter, Chase requested that Plaintiff propose a date to respond to the motion for judgment on the pleadings. Plaintiff ignored the request and instead threatened to press certain discovery issues.

Given that Plaintiff has failed to file any opposition to Chase's Motion for Partial Judgment on the Pleadings despite being given ample opportunity to do so and has not requested an extension to respond (despite Chase's prodding that she do so), Chase requests that the Court grant Chase's Motion for Partial Judgment on the Pleadings. (*Docket Entry 31*).

Dated: March 10, 2016

Respectfully submitted,

/s/ Mary J. Hackett

Mary J. Hackett

REED SMITH LLP

225 Fifth Avenue

Pittsburgh, PA 15222

Telephone: (412) 288-3250

Facsimile: (412) 288-3063

mhackett@reedsmith.com

*Counsel for Defendant/Cross-Claim Plaintiff
JPMorgan Chase Bank, N.A.*

CERTIFICATE OF SERVICE

The undersigned, an attorney, states that on March 10, 2016, the foregoing Notice of Non-Opposition to Defendant's Motion for Partial Judgment on the Pleadings was filed electronically with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to attorneys of record.

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